

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,**

Defendants,

-and-

**DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,**

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

**DEFENDANT ROBERT J. MUELLER'S OBJECTIONS TO PLAINTIFF'S
DESIGNATION OF POTENTIAL WITNESSES**

TO THE HONORABLE COURT:

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Sixth Amended Scheduling Order (ECF No. 140), Defendant Robert J. Mueller submits the following objections to Plaintiff Security and Exchange Commission's (the "SEC") Designation of Potential Witnesses. To the extent these objections have already been ruled on in prior proceedings, they are being made solely for the purposes of preservation.

I. WITNESSES THE SEC EXPECTS TO PRESENT

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
1.	Scott Allen 3009 Quail Hollow McKinney, TX 75072 (801) 669-2784	None.
2.	Jeffrey Anderson SEC employee and summary witness, contact through counsel	Undisclosed witness not listed on any disclosures.
3.	Dennis Concilla, Esq. c/o Monica Sansalone, Esq. Gallagher Sharp LLP 1215 Superior Ave., 7th Floor Cleveland, OH 44114 (216) 522-1154	None.
4.	Andrew Federico, Esq. c/o Monica Sansalone, Esq. Gallagher Sharp LLP 1215 Superior Ave., 7th Floor Cleveland, OH 44114 (216) 522-1154	None.
5.	John Gray 205 Viticole Lane Little Rock, AK 72223 (713) 705-7973	None.
6.	Brenda Jennings 11515 Fawnway Dr. Houston, TX 77048 (713) 898-1298	Undisclosed witness not listed on any disclosures.
7.	Brad Leon 620 Vista View Drive Ashville NC 28803-8572 (828) 273-0205	None.
8.	Charles McClain 601 W FM 117 Dilley, Texas 78017-3407 (830) 965-2139	Undisclosed witness not listed on any disclosures.
9.	Robert Mueller	None.
10.	Bill Post 50 California Street, Suite 1900 San Francisco, CA 94111 SEC expert, contact through counsel	None.

II. WITNESSES THE SEC MAY PRESENT

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
1.	Charlotte Acker 2313 Brittany Grace New Braunfels, TX 78130-8937 (325) 388-8460 (210) 862-9622	None.
2.	Lauren R. "Becca" Adams 12019 Trewell Glen San Antonio, TX 78249 (843) 903-2854	None.
3.	Thomas Andrew c/o Thomas D. Sherman, Esq. Locke Lord, LLP Terminus 200, Suite 1200 3333 Piedmont Road, N.E. Atlanta, GA 30305 (404) 870-4672	None.
4.	Carlotta Grice 17819 Scrub Oak Dr. Richmond, Texas 77407 (832) 423-0530	Undisclosed witness not listed on any disclosures.
5.	Patrick Lowe c/o Randy Pulman Pulman, Capuccio & Pullen, LLP 2161 NW Military Hwy, Suite 400 San Antonio, TX 78213 (210) 222-9494	None.
6.	Russell Putnam FactRight 7500 Flying Cloud Dr., Suite 755 Eden Prairie, MN 55344	None.
7.	Nathan Spradlin c/o Andrew R. Shedlock, Esq. Kutak Rock LLP 60 South Sixth Street, Suite 3400 Minneapolis, MN 55402-4018 (612) 334-5022	None.
8.	Chris Turner c/o J.D. Pauerstein, Esq. Rosenthal Pauerstein Sandoloski Agather LLP 755 East Mulberry, Suite 200 San Antonio, TX 78212	None.

NO.	NAME AND CONTACT INFORMATION	DEFENDANT'S OBJECTIONS
	(210) 225-5000	
9.	Representatives from the following entities:	None.
a.	Cycladic International	None.
b.	deeproot Funds or other related corporate entities	None.
c.	Factright, LLC	None.
d.	The Valhalla Group	None.
e.	Wells Fargo	None.

Dated: May 3, 2023

Respectfully submitted,

DAVIS & SANTOS, PLLC

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Counsel for Defendant Robert J. Mueller

CERTIFICATE OF SERVICE

I certify that on May 3, 2024, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ Caroline Newman Small
 Caroline Newman Small